

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DAVID DEJESUS, SR.,

Plaintiff,

v.

CORRECTIONAL MEDICAL SERVICES,  
INC., WILLIAM JOYCE and DANA BAKER,

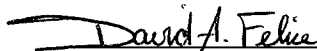
Defendants.

C.A. No. 06-209-JJF

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that Plaintiff David DeJesus, Sr. will take the deposition upon oral examination of Michelle Ward. The deposition will commence on Wednesday, July 9, 2008 at 1:00 p.m. at the law offices of Doroshow Pasquale Krawitz & Bhaya, Lotus Plaza, 911 S. Dupont Highway, Dover DE 19903. The deposition shall continue from day to day until completed, and it will be recorded by stenographic means. Pursuant to Rule 30(b)(5), the deponent is required to produce or make available at the deposition the documents requested in Exhibit A. You are invited to attend and participate.

Dated: June 27, 2008



Joseph J. Bellew (#4816)

David A. Felice (#4090)

Cozen O'Connor

1201 N. Market Street, Suite 1400

Wilmington, DE 19801

Telephone: (302) 295-2000

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*Attorneys for Plaintiff*

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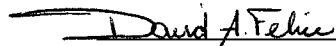
Defendants.

**CERTIFICATE OF SERVICE**

I, David A. Felice, do hereby certify that on June 27, 2008, I electronically filed the foregoing *Notice of Deposition Duces Tecum* with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

Eric Scott Thompson, Esquire  
Marshall Dennehey Warner Coleman & Goggin  
1220 North Market Street, 5th Floor  
P.O. Box 8888  
Wilmington, DE 19899

Dated: June 27, 2008



Joseph J. Bellew (#4816)  
David A. Felice (#4090)  
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Email: dfelice@cozen.com  
*Attorneys for Plaintiff*

# EXHIBIT A

## DEFINITIONS

1. The terms “you” or “your” shall refer to you, individually and/or as an employee of the Delaware Department of Correction.

2. The term “person” means any natural person and any corporation, business entity, association, government body or agency or other business enterprise or legal entity, and means both singular and plural.

3. The term “documents” shall be construed in the broadest possible sense, is intended to be comprehensive and includes, without limitation, all papers of any kind, all graphically recorded items, all electronically or magnetically recorded items such as video tapes, audio tapes and computer or word processor records and any other items, if anything, that can be requested pursuant to the Federal Rules of Civil Procedure. The term “documents” includes originals, drafts and all documents that differ in any respect from another version of that same document.

4. The term “identify” when applied to persons shall mean state their name(s) and current or last known business address(es) and telephone number(s).

5. The term “or” shall be construed either in the disjunctive or in the conjunctive whenever appropriate in order to bring within the scope of those interrogatories information that might otherwise be considered to be beyond their scope.

6. The word “all” shall mean both “any” and “all” as appropriate in order to bring within the scope of these interrogatories information that might otherwise be beyond their scope.

**DOCUMENT REQUESTS**

1. All documents authored or received by you (in your individual capacity or as an employee of the Delaware Department of Correction) that refer or relate to the medical care or treatment administered to David DeJesus, Sr.

2. All policies, procedures protocols or other guidelines for the examination of patients an the provision of medical care.

3. Any disciplinary notes, written reprimands or other reports of misconduct or nonfeasance levied or entered against you as a result of your job performance.